

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION**

IN RE:

Reagor-Dykes Motors, LP,
Reagor-Dykes Imports, LP,
Reagor-Dykes Amarillo, LP,
Reagor-Dykes Auto Company, LP,
Reagor-Dykes Plainview, LP, and
Reagor-Dykes Floydada, LP,
Reagor Auto Mall, Ltd.,
Reagor-Dykes Snyder, L.P.,
Reagor-Dykes Auto Mall I LLC,
Reagor-Dykes II LLC,
Reagor-Dykes III LLC,

Case No. 18-50214-rlj-11
Jointly Administered

Debtors,

Dennis Faulkner, Creditors' Trustee,

Plaintiff,

Adversary No. 20-05005-rlj

vs.

Ford Motor Credit Company LLC,

Defendant.

**DEFENDANT FORD MOTOR CREDIT COMPANY LLC'S
MOTION TO COMPEL PLAINTIFF'S ANSWERS AND RESPONSES
TO ITS FIRST SET OF INTERROGATORIES AND
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS**

Defendant Ford Motor Credit Company LLC ("Ford Credit") files this Motion to Compel Plaintiff Creditors' Trustee, Dennis Faulkner's ("the Trustee's") full and complete

supplemental answers and responses to Ford Credit's First Set of Interrogatories and Second Request for Production of Documents. In particular, this motion concerns the Trustee's supplemental answers and responses to Interrogatory Nos. 1 and 3 in Ford Credit's First Set of Interrogatories and Request for Production Nos. 1, 13-16, and 18-19 in Ford Credit's Second Request for Production of Documents.

Ford Credit's motion should be granted for the reasons set forth in the brief filed in support of same. Ford Credit respectfully requests a hearing on this motion.

PRAYER

Ford Credit respectfully requests that the Court enter an Order compelling the Trustee to provide full and complete supplemental answers and responses to Interrogatory Nos. 1 and 3 in Ford Credit's First Set of Interrogatories and Request for Production Nos. 1, 13-16, and 18-19 in Ford Credit's Second Request for Production of Documents. Ford Credit also respectfully requests that the Court enter an Order granting such other and further relief to which Ford Credit may be justly entitled.

Date: February 3, 2023

Respectfully submitted,

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*ATTORNEYS FOR DEFENDANT
FORD MOTOR CREDIT COMPANY LLC*

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for Ford Credit has conferred with counsel for the Trustee regarding this Motion and that the Trustee is opposed to the relief sought herein.

/s/ Craig A. Leslie
Craig A. Leslie